

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE : CHAPTER 13

KARYN KENYA JACKSON :
:
Debtor(s) : No. 24-10810 amc

**ANSWER TO THE MOTION OF US BANK TRUST NATIONAL ASSOCIATION FOR RELIEF
FROM THE AUTOMATIC STAY**

COMES NOW, Karyn Kenya Jackson, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submit the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-7. DENIED. The averments contained in these Paragraphs consist of summarizations or mischaracterizations of documents that speak for themselves, therefore, they are denied as no response is required.

8. DENIED. Debtor can neither admit nor deny this statement, therefore, it is denied.

9. DENIED. Debtor acknowledges falling behind with post-petition payments to Movant due to urgent unexpected home related expenses, however, Debtor disputes the total amount of the arrears alleged in the Motion. Debtor is currently gathering proof of payments and will forward receipts to Counsel. Debtor is desirous of entering into a Stipulation with Movant to cure any remaining arrears.

10. DENIED.

11. DENIED. Debtor can neither admit nor deny this statement, therefore, it is DENIED.

WHEREFORE, Debtor/Respondent prays that Movant's Motion be DENIED, and that Debtor/Respondent receives judgment for reasonable costs and attorney fees incurred in connection with the defense of this Motion.

February 27, 2025

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato
Michele Perez Capilato, Esquire

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